

Before the  
Federal Communications Commission  
Washington, D.C. 20554

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DEC 16 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

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Truth-in-Billing

)

And

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Billing Format

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)

CC Docket No. 98-170

**REPLY COMMENTS OF AMERITECH**

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**I. INTRODUCTION AND SUMMARY.**

In its Comments, Ameritech strongly supported the Commission's objective of telephone bills that are "user-friendly" so customers can "understand the services being provided and the charges assessed therefore, and to identify the entities providing those services."<sup>1</sup> For these reasons, Ameritech endorsed the development of general "truth-in-billing" guidelines that simplify telephone bills. However, Ameritech demonstrated that detailed federal billing regulations are neither necessary nor appropriate to achieve that result. So long as a carrier accurately and clearly bills for services ordered by the customer, the Commission need not regulate that carrier's commercial billing relationship with its customers.

A recurring theme throughout the comments is that consumers want bills that are simpler and more understandable. The problem is that some unscrupulous providers are taking advantage of the current complexity and confusion in billing to defraud customers by hiding in telephone bills unauthorized presubscribed interexchange carrier ("PIC") changes and charges

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<sup>1</sup> NPRM para. 1.

for service the customer did not order.<sup>2</sup> The obvious solution is to simplify telephone bills so customers can more easily detect fraud. Most parties recognize this. Yet, a few parties lose sight of it and propose measures that will have the opposite effect of further complicating billings.

A second message from the comments is that great care must be used to not impose rigid and detailed requirements that stifle competition and creativity. Like Ameritech, most other carriers understand that innovative and honest bills are a competitive necessity.<sup>3</sup> The Commission should not stifle these efforts.

The third theme from the comments is that carrier billings systems are complex and rigid and, therefore, do not readily support new capabilities. Moreover, modification of telephone billing systems or operations can be prohibitively expensive, oftentimes costing many millions of dollars per year per carrier. The capabilities of billing systems also vary widely between carriers, and what may be easy for one carrier to provide may be very expensive for another to develop. Therefore, billing changes should, to the extent feasible, be made consistent with each carrier's existing billing system capabilities and, thereby, avoid expensive system or processing modifications.<sup>4</sup> This can only be achieved if general guidelines are adopted that leave significant flexibility to local carriers.

Thus, the desired outcome of this proceeding is simpler, more understandable bills. However, bills can only be simple and understandable if they focus on the task at hand --

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<sup>2</sup> See, for example, National Consumers League ("NCL") who states that "[w]e believe that fraudulent service providers take advantage of several factors to deceive consumer; the fact that the telephone bills are many pages too long and that only the summary, not the details of the charges, appears on the first page. . . ," at 4-5.

<sup>3</sup> See, GTE at 8; "In the face of competition, carriers will be forced to upgrade their billing systems or lose customers to carriers that have already done so."

<sup>4</sup> This approach will further Year 2000 compliance by not requiring major network system software changes during a stabilizing period planned for the latter half of 1999 and early 2000. See, Ameritech's Comments at 18.

conveying data necessary for customers to readily validate their billing, and to then pay or dispute it. Mixing other objectives with billing, such as providing legal notices, specifying contract terms, or using bills as an education, advertising, marketing, or advocacy medium should be avoided. Although these functions are important, they should not be pursued in ways that impair customers ability to understand their bills.

## **II. THE COMMENTS VALIDATE AMERITECH'S CONCERNS.**

Around 90 parties filed comments in this matter, representing virtually every segment of the industry, plus several consumer advocacy and business customer groups. The comments in general validate the concerns raised by Ameritech in its Comments. Many of the comments also echo the proposals made by Ameritech. This is not surprising, since many carriers are receiving the same feedback from their customers, and face many of the same problems and limitations.

### **A. Above All Else, Customers Want Simple, Understandable And Accurate Bills.**

Of the 90 comments filed in this docket, none truly represent the perspective of the average residential end user. Yet a number of commenters have recently performed consumer surveys and focus group interviews designed to ascertain customers needs and desires.<sup>5</sup> In each case, the results are the same -- customers want concise, easily understandable and accurate bills.<sup>6</sup> Although the parties may use different words (such as "simpler" or more "user friendly") they all have the same basic thrust -- bills must become more understandable.

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<sup>5</sup> Ameritech at 2; GTE at 5; MCI at 6; and US West at 7.

<sup>6</sup> See, MCI at 7 ("clear and easily understandable"); and Sprint at 4 ("short, concise, readable and easy to understand").

The fact that customers want shorter and simpler bills is not lost on the carriers. Their comments recognize that customer friendly billings have become a competitive necessity.<sup>7</sup> In fact, several other carriers, like Ameritech, use their comments to describe new bill formats that have or will be shortly introduced.<sup>8</sup> These new bill formats are based upon extensive consumer research, and attempts to give customers what they want -- more user friendly billing formats. The Commission should give these new bill formats a chance to work. But whatever it does, the Commission should not suffocate this burst of competitive energy through a "one size fits all" requirement that impairs the industry's ability to respond to the changing needs of the customer segments it serves.<sup>9</sup> Rather, the Commission should permit the competitive marketplace to work to develop the optimal billing solutions that truly meet local customer needs, consistent with each carrier's capabilities.

**B. In Order To Be Simple And Understandable, Bills Should Not Contain Extraneous Data.**

No party claims that customers want more complex and longer bills. Yet, many non-carriers make proposals that would have the effect of dramatically increasing the size and complexity of bills. These proposals wrongly call for the inclusion of extraneous information that is not useful in reviewing and paying bills.<sup>10</sup> The objective of simplifying bills is already in

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<sup>7</sup> See, note 4, *infra*. The Commission need not look further than the experience of the automobile industry with the implementation of safety regulations which, when they became a competitive issue, were implemented far in advance of governmentally mandated deadlines and went well beyond those mandates.

<sup>8</sup> Ameritech at 2; Bell Atlantic at 3-4; GTE at 6. See, also Independent Telephone & Telecommunications Alliance (p. 3) which describes how Cincinnati Bell Telephone Company's bill format fully meets the Commission's objectives.

<sup>9</sup> AirTouch at 1-2 and 6; CTIA at 2; PCIC at 1. Also see, GTE at 9 "[T]he FCC must allow for different billing practices depending on the size of the customer and the nature of the customer bill."

<sup>10</sup> See, Florida PSC at 5, (identify taxing authority); Mississippi PSC at 2 (date of service announcement and an indication of regulatory authorization); Minnesota Office of Attorney General at 10 (name of each calling plan and

jeopardy, since several of the proposals in the NPRM would significantly increase the size of telephone bills. If all or even some of the proposals made in the comments were adopted, along with the ones in the NPRM, the result would be a bill of colossal proportions that would simply overwhelm customers.

The Commission correctly recognizes in the Notice that “[c]lear disclosure of every detail may add unnecessary information to a consumer’s bill without doing much to enlighten that consumer.”<sup>11</sup> In recognition of that concern, the Commission should reject proposals that would add data or complexity to bills beyond what is necessary for customers to verify the correctness of their bills or to contact their carrier with any questions or disputes.

Prime examples of data that is not necessary to validate and pay a bill is the proposed inclusion of PIC Protection status and 900 Blocking status on each month’s bill.<sup>12</sup> The fundamental flaw in this proposal is that the status of slamming protection and 900 blocking has nothing to do with what a customer is being billed each month. There is no charge on the bill for enrolling in either slamming protection or 900 blocking programs. Moreover, the status of these items does not change each month. As such, placing this data on a bill is distracting. It also could mislead customers into thinking there is a charge for these items, or that their status has changed. Moreover, their inclusion uses up valuable limited space on the Summary Page of a bill that can better be used to convey meaningful data.

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usage rates); and The Bills Project at 4 (date and method of consumer authorization of each new charge and name of who authorized it).

<sup>11</sup> NPRM ¶11.

<sup>12</sup> See, AT&T at 2; and FTC at 10. But see, Excel at 9; and Sprint at 7; both of whom oppose it on the ground that it may confuse and mislead customers.

The problem of using up valuable limited space on a bill with extraneous data is exacerbated by the fact that inclusion of either PIC Protection or 900 Blocking on a bill without further explanation may be confusing or may create a false sense of security. For instance, slamming protection does not protect against unauthorized changes by a switchless reseller who uses the same PIC as the customer's current facilities-based interexchange carrier. Thus, inclusion of PIC and 900 blocking status will also require an extensive explanation, which would require the use of further valuable limited space on bills.

Another example of a proposal that could greatly expand the size of a bill with extraneous detail is the inclusion of full service descriptions. Everyone agrees that line items on a bill should be sufficiently descriptive so customers know for what service they are being billed. The dispute is over how much detail should be provided. Most carriers wisely advocate the use of concise descriptions that enable customers to identify the service involved, but do not attempt to describe it. Even some non-carriers recognize that inclusion of full service descriptions would be counter-productive.<sup>13</sup> Yet, several non-carriers want to go much further and require provision of a "full" description of each service or feature.<sup>14</sup>

In its Comments, Ameritech discussed in detail why bills can only contain a brief description (24 or fewer letters) of each service itemized on the bill. It further showed that it is impractical and counter-productive to attempt to include full descriptions on bills.<sup>15</sup> In short, in order to keep bills concise and understandable and consistent with current systems limitations, such descriptions must be concise and provide just enough information for the customer to

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<sup>13</sup> Maine PSC at 5 ("redundant and would make bills too lengthy"); PSC of Wisconsin at 3 ("burdensome . . . this requirement would create unnecessary information overload").

<sup>14</sup> See, for example, New York Consumer Protection Board at 12; National Association of Attorneys General at 5.



identify the service involved. The bill is not and cannot become the contract between the parties, nor can it be a customer education tool. Use of billings for these purposes will undermine their usefulness as an invoice.

**C. In Order To Control Costs, Bill Simplification Should, To The Extent Feasible, Be Implemented Using Existing Systems And Practices.**

The Commission asks parties to address the extent to which they have “in place practices similar to, or that have the same effect as the proposals in this Notice.”<sup>16</sup> The Commission further asks for comment on less “burdensome practices that would achieve the same goals and ‘truth-in-billing’ guidelines.”<sup>17</sup> Many parties agree that the Commission should be mindful of the costs and burdens that will result from the adoption of any billing proposal, and should carefully weigh them against its benefits.<sup>18</sup> Further, no party claims that customers want to pay more as a result of billing. Thus, the Commission should carefully weigh the costs of any proposal against its benefit. To this end, the Commission should not adopt proposals that require significant modification of existing billing systems and practices that already meet the Commission’s objectives.

The comments further confirm Ameritech’s position that any outcome of this proceeding should recognize the wide range of system capabilities that is inherent in different billing systems. In fact, in some cases the billing systems of the same carrier have different capabilities

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<sup>15</sup> at 14-15.

<sup>16</sup> NPRM at ¶11.

<sup>17</sup> Id.

<sup>18</sup> See, for example, Sprint at 2-3; US West at 20.

in different geographic areas.<sup>19</sup> The comments provide ample evidence that what may seem like a simple requirement may in some cases exceed the capabilities of some carrier's billing systems, and may be exceedingly expensive to implement for many other carriers.

Perhaps the best example of a proposed requirement that would be very expensive for many carriers to implement is the proposal that bills identify new charges. This requirement seems simple on its face. Further, in an attempt to be helpful, the Federal Trade Commission ("FTC") proposes that it would be sufficient if carriers simply highlight such changes in the bill detail portion of the bill through the use of a different font and text type, such as bold type.<sup>20</sup> Yet, even with this modification the proposal fails to solve the fundamental problem posed by it - many carriers, both urban and rural, do not have billing systems that are technically capable of identifying that a charge is new.<sup>21</sup> Moreover, carriers from both the wireline and wireless segments confirms that it will be exceedingly expensive to modify their systems to support this capability.<sup>22</sup> For instance, MCI/WorldCom estimates that it will cost approximately \$15 million annually to implement that capability.<sup>23</sup> Moreover, LECs that address this issue agree that they do not have this capability with regard to billings that they receive from other carriers.<sup>24</sup> As a result, carriers should have some flexibility in performing this verification function. For

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<sup>19</sup> US West at 7; Bell South at 5. See also, SBC at 4-5, who uses different billing formats and practices between its various BOCs.

<sup>20</sup> FTC at 11.

<sup>21</sup> BellSouth at 5; Bell Atlantic at 6; PrimeCo at 6 and 16; QWest at 5.

<sup>22</sup> RCA at 4; Liberty Cellular at 2; PrimeCo at 6; BellSouth at 5; Bell Atlantic at 6.

<sup>23</sup> MCI/WorldCom at 35.

<sup>24</sup> See, BellSouth at 5.

instance, several carriers, like Ameritech, provide verification of an order for new services or features through separate letters or notices.<sup>25</sup>

**D. Designation Of Charges As Deniable Or Non-Deniable On A Bill Is A Poor Public Policy Choice.**

In paragraph 24 of the NPRM, the Commission asks if it should require that bills differentiate between charges for which local exchange or long distance service can be terminated (“deniable”) and those for which service cannot be terminated (“non-deniable”). Ameritech addressed this issue in detail in its Comments.<sup>26</sup> In summary, Ameritech agrees that customers that owe past due amounts should know how much they must pay to retain their local or long distance service. Equally as important, customers should be able to dispute any charge that they did not authorize, whether or not it is deniable. However, bills are not the appropriate vehicle for performing this notification function. Rather, Ameritech provides the amount that must be paid to retain local exchange or long distance service on its Discontinuance Notices. See, Attachment A hereof.

The vast majority of carriers oppose the proposal to designate services as deniable or non-deniable on bills for many of the same reasons as Ameritech. Basically, they also are concerned that such an identification on bills will lead to a significant rise in non-payment of legitimate charges and, thereby, inflate costs and the rates paid by the average honest customer.<sup>27</sup> Customers may also be misled into believing that payment of certain charges for services they

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<sup>25</sup> See, QWest at 6. See also, SBC at 11 (“the bill itself is not the only source of information”); and US West at 21-22 (“service fulfillment and customer education vehicles will be better suited for descriptions of complex regulatory proceedings and consequent charges”).

<sup>26</sup> Ameritech at 15-16.

<sup>27</sup> See, Liberty Cellular at 4; MediaOne Group at 2; and CTA at 7.

ordered is optional, when in fact they have a legal obligation to pay them.<sup>28</sup> Moreover, such a categorization may also leave the false impression that non-payment will not have adverse consequences, such as discontinuance of the service involved, damage to the customer's credit rating, collection actions, garnishment, etc.<sup>29</sup> Further, services and features are sometimes provided in packages, and it would be confusing if the services within these packages are billed or identified separately.<sup>30</sup>

A few non-carriers fret that failure to advise customers in their bills that non-payment of certain charges will not result in disconnection of their local service, will cause customers to pay for items they did not order out of a fear that otherwise their local service will be cut off.<sup>31</sup> As stated previously, Ameritech agrees that customers should know what amounts they need to pay to retain their local or toll service. But Ameritech, like many other carriers, provides this information through a separate mailing in the Disconnect Notice. Further, Ameritech's service representatives have knowledge of this information. This approach is more efficient since it provides payment information on what the customer must pay to retain their local or toll service, at the time it becomes an issue, and on the form the customer uses when addressing the issue.

The National Association of Statute Utility Advocates (at 10) alleges that incumbent LEC service representatives mislead customers as to the amount that must be paid to avoid disconnection of their local service. Although this allegation is not supported by any facts and is more appropriately the subject of a complaint proceeding, Ameritech would like to clarify its

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<sup>28</sup> MediaOne at 2.

<sup>29</sup> Id.

<sup>30</sup> AT&T at 10; Sprint at 5.

<sup>31</sup> See, for instance, Kansas Corporation Commission at 5; and The Coalition to Ensure Responsible Billing at 20.

practices. The allegation is irresponsible and untrue as to Ameritech. Ameritech's service representatives are extensively trained on the differences between deniable and non-deniable charges and the legal and regulatory requirements applicable to each. See, Attachment B. Moreover, inclusion of the amount due to retain local service on the Disconnection Notice shows a clear intention that customers understand their rights and not be misled, since it is the document the customer will refer to when contacting a service representative or paying their past due bill.

**E. There Is Broad Support For Many Of Ameritech's Other Proposals.**

There is also broad support for other positions taken by Ameritech in its Comments, including:

1. Business billings should be excluded from the billing guidelines.<sup>32</sup>
2. The guidelines should not apply to CMRS, where bills are already concise and slamming and cramming problems have not arisen.<sup>33</sup>
3. The toll free number of the entity that is servicing the customer's account should be shown on the detail pages, not those of other providers that do not have the authority or information to address that customer's questions and requests.<sup>34</sup>
4. Bills should identify each billing entity appearing in the bill and provide its toll free number.<sup>35</sup>
5. Bills can be organized by billing entity, with visual separation of service categories.<sup>36</sup>

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<sup>32</sup> AT&T at 4-5; and Sprint at 9.

<sup>33</sup> AirTouch at 1, 2, 6; CTIA at 4-5 and n.7; PCIA at 3, 5-6; PrimeCo at 1, 2, 5; Century at 3; and BellSouth at 11.

<sup>34</sup> AT&T at 15; and US West at 23. The bottom line is that the customer should not be sent on a "wild goose chase" by being given numbers of carriers that are not prepared to help the customer. NewNetworks Institute at 4, 10 also proposes that only one number be given on the bill. However, this proposal is flawed since in a competitive environment no one carrier is authorized to perform billing and collection services for all carriers.

<sup>35</sup> Coalition to Ensure Responsible Billing at 14.

**III. ISSUES RAISED BY SOME PARTIES ARE IRRELEVANT TO THIS DOCKET OR WILL MAKE BILLS LESS UNDERSTANDABLE.**

In the following section, Ameritech will respond to certain new issues that arose in the comments. These proposals do not respond to any questions posed by the Commission in the NPRM and are not relevant to this proceeding. The Commission should reject each of them as a distraction and focus on making consumer bills simpler and more understandable and accurate.

**A. Bills Are Not An Advertising, Marketing Or Education Medium.**

A few parties make self-serving proposals that the Commission compel LECs to permit these parties to insert their bills marketing, advertising, or educational pieces into the LEC's bills. These proposals should be rejected as inconsistent with the concept of bill simplification and understandability. Moreover, the issue of promotional use of LEC bills by third-parties is one of contract between the LEC and the other entity for whom the LEC's providing billing services.

An example of such a proposal that should be rejected as outside the scope of this proceeding, and inconsistent with its objectives, is MCI's and Pilgrim's requests to interject into this proceeding the issue of the terms under which LECs perform billing for dial around calls for interexchange carriers.<sup>37</sup> This issue does not relate to any issue raised by the Commission, nor does it have anything to do with bill format or understandability. In fact, its adoption would have the effect of further complicating bills. Moreover, even MCI and Pilgrim admit that the issue is already the subject of another proceeding.

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<sup>36</sup> See, Excel at 7-8; and Bell Atlantic at 4. But one party proposed that bills be organized by service category, with separation between each service. Texas Office of Public Counsel at 4. However, this proposal should be rejected since it would greatly expand the complexity and size of the bill. Further, based upon Ameritech's experience, customers expect to see the charges of each carrier presented in one location and would find a service-based bill organization confusing. In fact, no carrier who filed comments stated that it organizes its bill by service.

**B. Bill Detail Should Separately Itemize Miscellaneous Charges And, Where Applicable, Supply The Telephone Number Involved Only Where It Is The Best Identifier Of The Service Involved.**

Several parties make suggestions regarding the itemization of miscellaneous charges on customer bills. A few parties propose that, where applicable, these charges specify the number through which the service was accessed, which is included in the Telephone Disclosure and Dispute Resolution Act ("TDDRA") requirements.<sup>38</sup> Two parties propose that these miscellaneous charges be itemized separately from other charges.<sup>39</sup> As Ameritech discussed in its Comments, miscellaneous charges are itemized separately from other charges on each billing entity's detail page by sub-CIC. Included are charges for services other than toll services, such as voice mail and paging, as well as refunds and other transactions on the account. Separate totals are provided for each sub-CIC, if any.<sup>40</sup>

Regarding inclusion of a telephone number in the description of miscellaneous charges, Ameritech is concerned that the telephone number will not always provide the information that is most useful to the customer in recognizing the charge. It must be remembered, as previously described, that there is only a limited amount of space available to describe services and that it should, therefore, be used to convey the information most likely to jog the customer's memory. These descriptions are provided to Ameritech in the industry standard Exchange Message Interface ("EMI") format, which allows for descriptions of 24 character (letters) descriptions. As Ameritech explained in its Comments and many other LECs confirmed in their comments,

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<sup>37</sup> Pilgrim at 4; and MCI at 18.

<sup>38</sup> See, for example, FTC at 14, Texas Citizen Action Committee at 4.

<sup>39</sup> GUNA at 15; Vermont Public Service Board and Vermont Department of Public Service at 12.

expansion of these field limits would require extensive and expensive system modifications.<sup>41</sup>

Equally as important, longer descriptions would further complicate and lengthen bills while not providing information that is necessary for bill validation and payment.

Thus, required use of a telephone number in the service description would reduce by 10 the number of characters available to provide the identity of the provider and /or to describe the service or to just 14. In many cases, 14 characters is not sufficient space to identify the provider and the service. In Ameritech's experience, the name of the provider and a brief description of the service generally is a better memory jogger than the telephone number. Ameritech recommends that carriers be directed to provide meaningful and brief descriptions of miscellaneous charges, but that the Commission neither compel nor forbid the inclusion of the number used to access the service by application of TDDRA requirements to non-pay-per-call services.

**C. Showing Only One Customer Complaint Number On A Bill Would Be Misleading.**

New Networks Institute also argues that bills should contain just one customer complaint number.<sup>42</sup> However, this proposal is totally out of touch with the realities of the new competitive marketplace. Competitive LECs often do not want to have incumbent LECs, who are their competitors, perform inquiry and collection service for them and, therefore, make alternate arrangements for the performance of these functions. As such, directing customers to contact a single carrier (likely the incumbent LEC) would only send the customer on a "wild goose chase."

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<sup>40</sup> at 13.

<sup>41</sup> US West at 21; Bell Atlantic at 7; QWest at 6; and The Coalition to Ensure Responsible Billings at 19.



The best solution is the one proposed by Ameritech and most other carriers -- in conjunction with each service provide the number of the entity that is responsible and empowered to service it.<sup>43</sup>

Ameritech provides on its bills the toll free customer contact number of each billing entity on that entity's billing detail page. Ameritech's new bill format will also contain the identity and telephone number of each billing entity on the Summary Page. The number provided is each billing entity's customer service operations or a third party retained by it to perform that function. It is in the best interests of customers that they be provided with the number of the entity with the power and capability to handle customer inquiries and service complaints, make adjustments and resolve problems. Other numbers should not be placed on the bill where they can mislead customers.

**D. Directory Assistance Charges Are Clearly Itemized On Ameritech's Bills.**

New Networks Institute complains that customers do not know that they are paying per use charges for directory assistance because those charges are not itemized on customer bills.<sup>44</sup> However, New Networks is mistaken as to Ameritech. Ameritech does in fact itemize the charges that it assesses for use of its directory assistance service in the local charges section of its bills by specifying the total number of directory assistance calls made, the rate per call, and the aggregate charge for directory assistance calls. Charges for calls placed to other carriers' directory assistance services are identified on those carriers' bill detail pages, and incorporate the service mark of that specific directory assistance service, where Ameritech is authorized to use it.

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<sup>42</sup> At 10. See also, Florida PSC at 11.

<sup>43</sup> Ameritech at 16. See also, n. 34, *infra*.

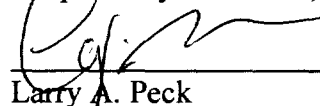
<sup>44</sup> at 5.

#### IV. CONCLUSION.

Ameritech strongly endorses development of industry guidelines that simplify bills while allowing sufficient latitude that they do not to significantly increase costs or stifle creativity. Ameritech proposes principles in its Comments that it believes will achieve those objectives. Ameritech reiterates those objectives here. In particular, Ameritech, like many other carriers, is implementing a corporate stabilization period on major network and computer changes during the latter part of 1999 and early 2000. The purpose of this stabilization period is to facilitate resolution of Year 2000 problems. For this reason, the Commission should not mandate any billing changes that would necessitate major changes during the stabilization period.

In light of some of the proposals in the comments, Ameritech would like to add that in order to facilitate simpler and more understandable bills, the Commission should reject proposals that will increase the size or complexity of billings. For the same reason, it should ensure that bills only contain information that is necessary for customers to validate and pay their bills or to question them. Bills also should not specify that services are deniable or non-deniable, since that designation will mislead customers and inflate costs and uncollectable amounts to the detriment of honest consumers who pay for what they order. The better course is to specify that information in disconnection or other separate notices.

Respectfully submitted,



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Dated: December 16, 1998

# **Attachment A**

<b>OHIO DENIAL NOTICE</b> <b><i>Effective 12/12/98</i></b>
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## **DISCONNECTION NOTICE**

### **YOUR ACCOUNT IS PAST DUE IN THE AMOUNT OF \$TOTAL PAST DUE.**

- \$Deniable must be received by Disconnection Date to prevent disconnection of your local telephone service.
- If telephone service is disconnected, a reconnection charge of \$Charge will apply and a deposit may also be required.
- The past due amount of \$NonDeniable-Toll must also be received by the above disconnection date to prevent disconnection of your long distance service.
- Any remaining past due amount must also be received by the above disconnection date. Non-payment of these charges cannot result in disconnection of local telephone service or long distance service. However, non-payment can result in legal action, referral to a collection agency, and removal of the services (e.g. paging and voicemail) for which payment is due.
- Payment at an unauthorized payment agency may result in late or improper payment application. Allow 5 business days for mail.
- If you wish to pay your past due balance with a credit card or automatic withdrawal from your bank account, or have questions about this notice, call the collection office at 1-800-634-4948.
- Please disregard this notice if payment has already been made.
- If you are dissatisfied with our response to your inquiry, you have the option of contacting the Public Utilities Commission of Ohio, 180 E. Broad, Columbus Ohio 43215-3793 or call 1-800-686-PUCO (7826); or TTY (hearing impaired) 1-800-686-1570.

# **Attachment B**

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## Deniable and Non-Deniable Charges

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### Introduction

(WLACC & ELACC - Indiana)

**EXPLAIN:**

Ameritech charges are categorized as either:

- deniable (regulated), or
  - non-deniable (deregulated)
- 

### Definitions

**EXPLAIN:**

Deniable charges are:

- rates and services that have to be approved by our state's public utility commissions.

*Examples* of deniable charges include the monthly rate for:

- custom calling features
- the account holder's local calling plan (i.e., class of service)
- our long distance charges

Non-deniable charges are:

- rates and services that we can change without approval by the commissions.

The more common examples of non-deniable charges include:

- 900/976 charges
  - Linebacker
  - Voice Mail
  - Customer Provided Equipment (e.g., Caller ID display device, feature phones, etc.)
  - Telegrams
  - Time and Material charges
- 

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## Deniable and Non-Deniable Charges, Continued

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### Definitions, continued

#### **EXPLAIN:**

Our states' commissions and Federal Communications Commissions (the FCC) prohibit us from denying service if the account holder decides not to pay for non-deniable charges.

#### **VERIFY** students are:

- familiar with what 900 and 976 calls are, and
  - the charges that go along with them.
- 

### Introduction

(OLACC & ELACC - Michigan)

#### **EXPLAIN:**

Ameritech charges are categorized into 3 categories:

- deniable regulated,
  - non-deniable regulated and
  - non-deniable non regulated
- 

### Definition

#### **EXPLAIN:**

Deniable regulated charges are:

- rates and services that have to be approved by our state's public utility commissions.

*Examples* of deniable charges include the monthly rate for:

- the account holder's local calling plan (i.e., class of service)
  - Ameritech long distance charges and regulated carrier toll (ELACC only)
  - custom calling features (OLACC only)
  - Directory Assistance (OLACC only)
- 

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## Deniable and Non-Deniable Charges, Continued

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**Definitions,**  
continued

**EXPLAIN:**

Non-deniable regulated charges are rates

- that are approved by our state's public utility commissions but we have been told that we cannot deny service for these services such as:
- our long distance charges both Ameritech & other Carriers(OLACC only)
- Directory Assistance (ELACC only)

Non-deniable non-regulated charges are:

- rates and services that we can change without approval by the commissions.

The more common examples of non-deniable charges include:

- 900/976 charges
- Linebacker
- Voice Mail
- Customer Provided Equipment (e.g., Caller ID display device, feature phones, etc.)
- Telegrams
- Time and Material charges
- Custom Calling features (ELACC only)

Our states' commissions and Federal Communications Commissions (FCC) prohibit us from denying service if the account holder decides not to pay for non-deniable charges.

**VERIFY** students are:

- familiar with what 900 and 976 calls are, and
  - the charges that go along with them.
- 

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## Balance Due Apportionment System (BDAS)

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### Introduction

(All LACCs)

**EXPLAIN:**

To separate deniable from non-deniable charges, Ameritech uses a Balance Due Apportionment System (BDAS).

Its purpose is to ensure our account holders are not disconnected for non-deniable charges.

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### DNAMT and TOT DN fields

**ADVISE** students to access:

IN NPA	IL NPA	MI NPA	OH NPA	WI NPA	Account Number
219	847	248	216		926-0088 XXX

- locate the DNAMT and TOT DN fields in the Situation Summary

**EXPLAIN :**

DNAMT - Denial Notice Amount is the total amount that is past due. It includes all deniable and non-deniable money due Ameritech.

The TOT DN - Total Deniable is the total deniable money. Non-deniable money is not included in this amount.

(ELACC - Indiana)

**EXPLAIN:**

In the "Live" data base these two amounts are the same.

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## Balance Due Apportionment System (BDAS), Continued

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**DNAMT and  
TOT DN fields,  
continued**

**(ELACC - Indiana)**

**REFER** students to:

- Exhibit 1 - Primary Account Screen - Indiana
- DNAMT and TOT DN fields.

**EXPLAIN:**

This is because Indiana is not a BDAS state, we do not use BDAS to separate our deniable and deniable charges, this will have to be done manually.

After manually calculating this, if the deniable charges are still above the DIRA, then the service can be denied.

Once the service is denied, it will be restored only when the total past due balance is paid below the DIRA .

To determine the amount of the deniable charges you will need to access BI and:

- check the Itemized Call screens and note the amount of the 900/976 calls and telegram charges
- check the Customer Service Record and note the amount billed for non-deniable charges
- check the Other Charges & Credits pages and note the total amount of any Time and Material charges
- total the above amounts
- subtract that amount from the account holder's total past due amount

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## Balance Due Apportionment System (BDAS), Continued

DNAMT and  
TOT DN fields,  
continued

(All LACCs)

### EXPLAIN :

The TOT DN amount is updated simultaneously throughout the day as payments/adjustments are posted to the account, thus giving you a current status.

### QUESTIONS AND ANSWERS

If you needed to determine the amount of the non-deniable charges, how could you determine that?

- subtract the TOT DN from the DNAMT

What is the amount of the non-deniable charges for this account?

- \$128.00 (\$589.00 - \$461.00)

### EXPLAIN:

To ensure you have a clear understanding of the DNAMT and TOT DN fields, let's practice with account:

IN NPA	IL NPA	MI NPA	OH NPA	WI NPA	Account Number
317	773	313	330		388-0142 XXX

### QUESTIONS AND ANSWERS

What is the:	Answers:
• DN AMT?	\$923.00
• TOT DN?	\$761.00
• Non-Deniable amount?	\$162.00

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## Balance Due Apportionment System (BDAS), Continued

DNAMT and  
TOT DN fields,  
continued

### EXPLAIN:

If this account holder decided not to pay the non-deniable amount of \$162.00, Ameritech could not deny the account, even if the amount was over the DIRA.

### QUESTIONS AND ANSWERS

What is the CUR DUE for:

IN NPA	IL NPA	MI NPA	OH NPA	WI NPA	Account Number
812	312	810	419		269-1872 XXX

 ?

- \$821.00

What is the Non-Deniable amount? Why?

- \$821.00
- TOT DN field is \$0

What is the treatable amount for:

IN NPA	IL NPA	MI NPA	OH NPA	WI NPA	Account Number
812	708	810	419		756-1235 XXX

 ?

- \$187.00

For what amount can we not deny service?

- \$31.00

What does this amount tell us?

- \$31.00 is for non-deniable charges

How did you figure out the non-deniable charges?

- Subtracted the TOT DN amount from the DNAMT amount.

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## View 3 Screen

### View 3

#### EXPLAIN:

A View 3 Screen has Non-Deniable/Deniable Data available to view. This screen:

- It contains up to 12 months of deniable and non-deniable charges
  - use <F20> to scroll the pages to display previous months of information
  - use the <F19> to scroll back to the previous screen

#### NOTE TO INSTRUCTOR

The TDB does not have the information on the screen as of 6-97. You will need to find a live account that has this information filled in.

#### ADVISE students to:

- access the View 3 for XXX XXX XXX

#### EXPLAIN:

We will discuss the fields found on the View 3 screen, and as each field is discussed, locate each field on the screen

Field:	Description:
BILLED	<ul style="list-style-type: none"><li>• is the total amount owing on the account holder's bill; it includes:<ul style="list-style-type: none"><li>- previous balances, and</li><li>- current charges</li></ul></li><li>• it is updated immediately with payments/adjustments</li></ul>
PYT/ADJ	<ul style="list-style-type: none"><li>• is a total of all payments and adjustment for that billing period</li></ul>
BAL OWED	<ul style="list-style-type: none"><li>• it is the amount in treatment.</li><li>• is the amount that the notice was mailed, minus any adjustments/payments that may have been applied</li></ul>

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## CERTIFICATE OF SERVICE

I, Todd H. Bond, do hereby certify that a copy of the foregoing Reply Comments of Ameritech has been served on all parties of record, via first class mail, postage prepaid, on this 16<sup>th</sup> day of December, 1998.

By:

A handwritten signature in black ink, appearing to read "Todd H. Bond", written over a horizontal line.

Todd H. Bond